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DELIVERED VIA ECF FILING

January 16, 2024

The Honorable Katherin Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007
Tel: (212) 805-0290
Email: Failla_NYSDChamers@nysd.uscourts.gov

MEMO ENDORSED

Re: *Bush Baby Zamagate, Inc. v. Chapter 4 Corp., d/b/a Supreme, et. al.*
Case Number: 1:23-cv-08946-KPF

Your Honor:

Our firm represents Kejuan Muchita Inc., a co-defendant in the above-captioned matter. We respectfully submit this letter, with the consent of all counsel for Plaintiff Bush Baby Zamagate, Inc. (“Plaintiff”) and Defendants Chapter 4 Corp., d/b/a Supreme, Kejuan Muchita Inc., and The Executors of the Albert Jackson Johnson Estate (collectively, “Defendants”) in this matter to respectfully request a further thirty (30) day continuance of the due date for Defendants’ Answer in this matter, currently scheduled for January 18, 2024, to February 19, 2024. This is the parties’ second request for a continuance or adjournment of the Answer due date. Please be advised that the parties have exchanged and are reviewing a draft settlement agreement and the parties believe they are close to resolving this matter.

The Court previously granted a continuance of the Initial Pretrial Conference pursuant to Fed. R. Civ. P. 16 (the “Rule 16 Conference”) on December 21, 2023 and adjourned the Rule 16 Conference *sine die* to afford the parties time to finalize the settlement in this matter.

Thank you, in advance, for your consideration and the parties will inform the Court of any further developments with respect to settlement and resolution of this matter.

Respectfully Submitted,

/AJS/

Albert J. Soler
Attorneys for Defendant Kejuan Muchita Inc.

cc: All Counsel of Record (via ECF)

Application GRANTED. Defendants shall answer, move, or otherwise respond to the Complaint on or before **February 19, 2024**.

Dated: January 17, 2024
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE